

L. Vartain Horn Decl.

Exhibit 2

Laura Vartain Horn (SBN 258485)
KIRKLAND & ELLIS LLP
 555 California Street, Suite 2700
 San Francisco, CA 94104
 Telephone: (415) 439-1625
 laura.vartain@kirkland.com

Allison M. Brown (Admitted *Pro Hac Vice*)
KIRKLAND & ELLIS LLP
 2005 Market Street, Suite 1000
 Philadelphia, PA 19103
 Telephone: (215) 268-5000
 alli.brown@kirkland.com

Jessica Davidson (Admitted *Pro Hac Vice*)
KIRKLAND & ELLIS LLP
 601 Lexington Avenue
 New York, NY 10022
 Telephone: (212) 446-4800
 jessica.davidson@kirkland.com

Attorneys for Defendants
 UBER TECHNOLOGIES, INC., RASIER, LLC,
 and RASIER-CA, LLC

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

IN RE: UBER TECHNOLOGIES, INC.,
 PASSENGER SEXUAL ASSAULT
 LITIGATION

Case No. 3:23-md-03084-CRB

**DECLARATION OF WILLIAM
 ANDERSON**

This Document Relates to:
 All Cases

DECLARATION OF WILLIAM ANDERSON

I, William Anderson, declare the following:

1. I am over the age of 18 and am a resident of Denver, Colorado.

2. I am a Manager, eDiscovery at Uber Technologies, Inc. (“Uber”). I know the following facts to be true of my own knowledge, except those matters stated to be based on information and belief, and if called to testify, I could competently do so.


3. I have reviewed the article relating to this litigation that appeared in the *New York Times* on August 6, 2025 (hereinafter “Article”).

4. After review of the Article, I contacted each Uber employee who, based on a reasonable investigation, may have had access to the compilation of sealed documents/exhibits (or a significant subset thereof) submitted in connection with Plaintiffs’ summary judgment opposition in the JCCP. Each of those attorneys and staff members confirmed that they had not shared or in any way provided access to any of the documents referenced in the Article to the *New York Times* or its agents, either directly or indirectly.

5. In addition, I hereby confirm that I have not shared or in any way provided access to any of the documents referenced in the Article to the *New York Times* or its agents, either directly or indirectly.

I declare under penalty of perjury under the laws of the State of California and the laws of the United States of America that the foregoing is true and correct.

Executed on August 12, 2025, in Denver, CO.

Signed by:

4BAD6A68831456...
William Anderson